

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
  
as representative of  
  
THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
  
Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS  
(Jointly Administered)

**JOINT INFORMATIVE MOTION OF DISCOVERY DISPUTE BETWEEN  
DRA PARTIES, THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO, AND THE PUERTO RICO  
FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY**

**To The Honorable United States District Judge Laura Taylor Swain:**

The Court is hereby notified of a discovery dispute between AmeriNational Community Services, LLC (the “Servicer”), as servicer for the GDB Debt Recovery Authority (the “DRA”), and Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company (the “Collateral Monitor,” and together with the Servicer, collectively, the “DRA Parties”), which serves as the collateral monitor for Wilmington Trust, N.A. in connection with the new bonds that the DRA issued pursuant to the *Government Development Bank for Puerto Rico Debt Restructuring Act*, Act No. 109-2017, as amended by Act No. 147-2018, and the approved Qualifying Modification

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801).

for the Government Development Bank for Puerto Rico (the “GDB”)<sup>2</sup> under Title VI of the *Puerto Rico Oversight, Management and Economic Stability Act* (“PROMESA”), and the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative for the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Public Buildings Authority (“PBA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth and PBA, the “Debtors”) pursuant to the *Puerto Rico Oversight, Management and Economic Stability Act*,<sup>3</sup> and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF” and together with AAFAF, the “Government Parties”) regarding the DRA Parties’ Third Request for Production of Documents to the FOMB (the “Oversight Board Requests”) and the DRA Parties’ Third Request for Production of Documents to AAFAF (the “AAFAF Requests,” and together with the Oversight Board Requests, the “Requests”).

The DRA Parties served the Requests on September 16, 2021. The Government Parties each served Responses and Objections to the Requests (the “Responses and Objections”) on September 23, 2021. The DRA Parties met and conferred with the Government Parties on September 27, 2021 regarding the Requests and the Responses and Objections. On September 29, 2021, the DRA Parties and the Government Parties held a second meet and confer, at the conclusion of which the DRA Parties and Government Parties agreed that there was a dispute that would need to be resolved by the Court. That same day, the DRA Parties informed Magistrate Judge Dein’s chambers of the existence of the dispute, copying the Government Parties. Soon thereafter, Magistrate Judge Dein’s Clerk instructed the DRA Parties and the Government Parties

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<sup>2</sup> See ECF No. 270 of Civil Case No. 18- 01561 (LTS) (Nov. 7, 2018).

<sup>3</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

to submit letters to Magistrate Judge Dein by October 4, 2021, and to file this Joint Informative Motion with the Court. On September 30, 2021, Magistrate Judge Dein's Clerk scheduled a conference with Magistrate Judge Dein for October 7, 2021 at 4 p.m. E.T.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 1st date of October, 2021.

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**CERTIFICATE OF SERVICE**

I hereby certify that, on October 1, 2021, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case.

/s/ Arturo J. García-Solá  
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